

III. Remarks

Claims 4-14, 21-22, and 25-46 were previously pending. Claim 7 has been cancelled. Claims 4, 6, 21 and 25 have been amended. Reconsideration of Claims 4-6, 8-14, 21-22 and 25-46 in light of the above amendments and the following remarks is respectfully requested.

Support for the amendments for the Web server device in Claims 4, 21 and 25 may be found, *inter alia*, in paragraphs 0064, 0081-0082. Support for the amendments for the client device control section may be found, *inter alia*, in paragraphs 0085 and 0062, and Fig. 9. Support for the amendments for the command conversion section in Claims 6 and 25 may be found, *inter alia*, in paragraph 0085. No new matter has been added by the amendments. Reconsideration of Claims 4-6, 8-14, 21, 22, and 25-46 in light of the above amendments and the following remarks is respectfully requested.

Rejections under 35 U.S.C. §103(a) (Huitema in view of Burgess)

The Office Action indicated that Claims 4, 5, 21 and 22 were rejected under 35 U.S.C. §103(a) as being unpatentable over US 2002/0073215 A1 to Huitema et al. in view of US 2001/0012296 A1 to Burgess et al. Applicants respectfully traverse the rejection of Claims 4, 5, 21 and 22 for the following reasons.

Claim 4 as amended with this paper is as follows:

4. An Internet connection system, comprising:
 - a relay device connected to a client device and provided in a first network, the first network communicated in a first protocol; and
 - a server connected to the relay device through a second network in a second protocol,
the second network being the Internet,
 - wherein the relay device comprises:
 - a client device global address storage section for storing a global address of the client device in the first protocol;
 - a server address storage section for storing a global address of the server in the second protocol;
 - a first routing device for routing a connection from the client device through the server based on the global address of the server stored in the server address storage section; and
 - a first packet processing device for capsulating/decapsulating packets, the packets being in the first protocol, using the second protocol to thereby establish a tunneling connection with the server in the first protocol,
 - and wherein the server comprises:
 - a Web server device for receiving a selection of the client device and an instruction for controlling the client device from a user via the Internet,
 - a second packet processing device for capsulating/decapsulating packets, the packets being in the first protocol, using the second protocol to thereby establish a tunneling connection with the relay device;

a client device global address management device for managing the global address of the client device in the first protocol, the client device connected to the relay device, in association with a global address of the relay device in the second protocol;

a second routing device for routing a connection to the relay device based on the global address of the client device managed by the client device global address management device; [[and]]

a model identification section for determining if the client device is of a predetermined manufacturer model and/or the relay device is of a predetermined manufacturer model; and

a client device control section for receiving the selection of the client device and the instruction from the Web server device, receiving the manufacturer model of the client device or the relay device determined in the model identification section, and sending a packet including a command to the client device based on the instruction and the manufacturer model.

Claim 4 claims a system that allows a user to control a client device located within a first network, such as an IPv6 or IPv4 private network, from outside the network by accessing a server on the Internet (Web server device) and sending a command to control the specific manufacturer model of the client device through a tunneling connection established between a relay device in the first network and the server via the Internet. For example, in the embodiment described in paragraph 0096, “a home security camera (“client device”)...may be activated and controlled even when the homeowner is away home through the InterServer 6 (“server”) and the InterBOX 3 (“relay device”)”.

The examiner states that all elements of the previously presented claim 4 are disclosed in Huitema, except the model identification section of Burgess. With respect to the server of the claimed invention, the examiner equates it with the IPv4/Inv6 filter described in Huitema. However, Huitema does not describe that the IPv4/Inv6 filter has a Web server device or a client device control section, or any configurations that allow a user to select and control a device located outside the private network where the IPv4/Inv6 filter is physically located.

As indicated by the examiner, Burgess describes that the forwarding of a data packet is prevented unless the media access control address of the destination or sender of the data packet matches an address in a table. Because of that, a multi-port network communication device of Burgess may determine the particular manufacturer model of a destination or sender device from its media access control address. However, the multi-port network communication device of

Burgress is a device used within a private network, and the purpose of determining a media access control address is for restricting packet traffic only.

In contrast to the teachings of Burgress, the model identification section of the claimed invention is located in a server which is accessible from the Internet via its web server device, unlike the multi-port network communication device of Burgress, and used to determine the manufacturer model of a user selected device in order to control the particular device model. Since Burgress does not supply the required features missing from Huitema (*i.e.* a Web server device for receiving a selection of the client device and an instruction for controlling the client device from a user via the Internet, and a client device control section for receiving the selection of the client device and the instruction from the Web server device and sending a command to the client device based on the instruction and the manufacturer model), the combined teachings of Huitema and Burgress do not teach or suggest the claimed invention, as set forth in claim 4.

The examiner further indicated that Simpson et al. (US 6,405,310 B1) teaches the client device control section recited in claim 7. However, Simpson's device does not receive a selection of a client device to be controlled and a control instruction from a Web server device. Therefore, Simpson does not disclose a client device control section, as defined in claim 4, or supply the required features missing from Huitema and Burgress. Consequently, the combined teachings of Huitema, Burgress, and Simpson do not teach or suggest the claimed invention, as set forth in claim 4.

Claim 21 as amended is similar to Claim 4; therefore, the same arguments stated above apply to Claim 21 as well. Accordingly, applicants respectfully request that the rejection of claims 4, 5, 21, and 22 under 35 U.S.C. § 103(a) over Huitema in view of Burgress be withdrawn. Furthermore, because Claims 5, 6, 8-14 depend from and further limit Claim 4, applicants submit that Claims 5, 6, 8-14 are in condition for allowance. Claim 22 depends from and further limits Claim 21. Therefore, applicants submit that Claim 22 is also in condition for allowance.

Rejections under 35 U.S.C. §103(a) (Huitema – Burgess in view of Hovell)

Claims 6, 25, 26, 30, 31, 37-40, 43 and 45 were rejected under 35 U.S.C. §103(a) as being unpatentable over Huitema – Burgess in view of Hovell et al. (US 7,188,191 B1). Applicants respectfully traverse the rejection of Claims 6, 25, 26, 30, 31, 37-40, 43 and 45 for the following reasons.

With respect to Claim 25, the same arguments set forth above with respect to Claim 4 apply to Claim 25, except for the command conversion section. As for the command conversion section recited in Claims 6 and 25, the examiner states that Hovell teaches a command conversion section. However, the command conversion section of Claims 6 and 25 has the following limitations:

“a command conversion section for converting said instruction received from the user at the Web server device to a command to be sent to the client device in a predetermined manufacturer model specific format to control the client device based on the manufacturer model determined by the model identification section”.

As indicated in the above-quoted claim language, an instruction to control a client device is received from a user at the Web server device. Therefore, it is not a matter of routing a data packet containing a command to a destination. The instruction received from a web page, like the one shown in Fig. 8, has to be converted to a command that can be read by the particular client device model. For example, commands may be generated from a message described in the HTML language (paragraph 0099), which cannot be read by the client device and cause an intended operation in the client device without an appropriate conversion of the message. Since the conversion of IP header from IPv4 to IPv6 or IPv6 to IPv4 described in Hovell does not change the actual content of data beside the IP header, it does not show or suggest the command conversion section claimed in Claims 6 and 25.

Consequently, the combined teachings of Huitema, Burgess, and Hovell do not teach or suggest the claimed invention, as set forth in Claims 6 and 25. Accordingly, applicants respectfully request withdrawal of the rejection of Claims 6, 25, 26, 30, 31, 37-40, 43 and 45 under 35 U.S.C. § 103(a) over Huitema-Burgess in view of Hovell.

Because Claims 26-46 depend from and further limit Claim 4, applicants submit that Claims 26-46 are allowable as well.

Rejections under 35 U.S.C. §103(a) (Huitema – Burgess in view of Simpson)

Claims 7, 12 and 14 were rejected under 35 U.S.C. §103(a) as being unpatentable over Huitema – Burgess in view of Simpson et al. (US 6,405,310 B1).

Claim 7 has been cancelled. Applicants respectfully traverse the rejection of Claims 12 and 14 because Simpson does not supply the required features missing from Huitema and Burgess (*i.e.* a Web server device for receiving a selection of the client device and an instruction for controlling the client device from a user via the Internet, and a client device control section for receiving the selection of the client device and the instruction from the Web server device and sending a command to the client device based on the instruction and the manufacturer model). Therefore, it is believed that Claims 12 and 14 are in condition for allowance.

Rejections under 35 U.S.C. §103(a) (Huitema – Burgess in view of Ramachandran)

Claims 8-11 and 22 were rejected under 35 U.S.C. §103(a) as being unpatentable over Huitema – Burgess in view of Ramachandran et al. (US 7,360,245 B1).

Applicants respectfully traverse the rejection of Claims 8-11 and 22 because Ramachandran does not supply the required features missing from Huitema and Burgess (*i.e.* a Web server device for receiving a selection of the client device and an instruction for controlling the client device from a user via the Internet, and a client device control section for receiving the selection of the client device and the instruction from the Web server device and sending a command to the client device based on the instruction and the manufacturer model). Therefore, it is believed that Claims 8-11 and 22 are in condition for allowance.

Rejections under 35 U.S.C. §103(a) (Huitema-Burgess-Simpson in view of Tarr)

Claims 13, 34 and 35 were rejected under 35 U.S.C. §103(a) as being unpatentable over Huitema-Burgess-Simpson in view of Tarr et al. (US 6,978,314 B2).

Applicants respectfully traverse the rejection of Claims 13, 34 and 35 because Tarr does not supply the required features missing from Huitema, Burgess and Simpson (*i.e.* a Web server device for receiving a selection of the client device and an instruction for controlling the client device from a user via the Internet, and a client device control section for receiving the selection of

the client device and the instruction from the Web server device and sending a command to the client device based on the instruction and the manufacturer model, or a command conversion section for converting an instruction received from a user at the Web server device to a command to be sent to the client device in a predetermined manufacturer model specific format to control the client device). Therefore, it is believed that Claims 13, 34, and 35 are in condition for allowance.

Rejection under 35 U.S.C. §103(a) (Huitema-Hovell in view of Tarr)

Claim 27 was rejected under 35 U.S.C. §103(a) as being unpatentable over Huitema-Hovell in view of Tarr et al.

Applicants respectfully traverse the rejection of Claim 27 because Tarr does not supply the required features missing from Huitema-Hovell (*i.e.* a Web server device for receiving a selection of the client device and an instruction for controlling the client device from a user via the Internet, and a command conversion section for converting an instruction received from a user at the Web server device to a command to be sent to the client device in a predetermined manufacturer model specific format to control the client device). Therefore, it is believed that Claim 27 is in condition for allowance.

Rejections under 35 U.S.C. §103(a) (Huitema-Burgess-Hovell in view of Ramachandran)

Claims 28 and 29 were rejected under 35 U.S.C. §103(a) as being unpatentable over Huitema-Burgess-Hovell in view of Ramachandran et al.

Applicants respectfully traverse the rejection of Claims 28 and 29 because Ramachandran does not supply the required features missing from Huitema-Burgess-Hovell (*i.e.* a Web server device for receiving a selection of the client device and an instruction for controlling the client device from a user via the Internet, and a command conversion section for converting an instruction received from a user at the Web server device to a command to be sent to the client device in a predetermined manufacturer model specific format to control the client device). Therefore, it is believed that Claims 28 and 29 are in condition for allowance.

Rejections under 35 U.S.C. §103(a) (Huitema-Burgess-Hovell in view of Simpson)

Claims 32, 33, 36, and 41 were rejected under 35 U.S.C. §103(a) as being unpatentable over Huitema-Burgess-Hovell in view of Simpson et al.

Applicants respectfully traverse the rejection of Claims 32, 33, 36 and 41 because Simpson does not supply the required features missing from Huitema-Burgess-Hovell (*i.e.* a Web server device for receiving a selection of the client device and an instruction for controlling the client device from a user via the Internet, and a command conversion section for converting an instruction received from a user at the Web server device to a command to be sent to the client device in a predetermined manufacturer model specific format to control the client device). Therefore, it is believed that Claims 32, 33, 36, and 41 are in condition for allowance.

Rejection under 35 U.S.C. §103(a) (Huitema-Burgess-Hovell-Simpson in view of Zenchelsky)

Claim 42 was rejected under 35 U.S.C. §103(a) as being unpatentable over Huitema-Burgess-Hovell-Simpson in view of Zenchelsky et al (US 6,233, 686 B1).

Applicants respectfully traverse the rejection of Claim 42 because Zenchelsky does not supply the required features missing from Huitema-Burgess-Hovell-Simpson (*i.e.* a Web server device for receiving a selection of the client device and an instruction for controlling the client device from a user via the Internet, and a command conversion section for converting an instruction received from a user at the Web server device to a command to be sent to the client device in a predetermined manufacturer model specific format to control the client device). Therefore, it is believed that Claim 42 is in condition for allowance.

Rejections under 35 U.S.C. §103(a) (Huitema-Burgess-Hovell in view of Zenchelsky)

Claims 44 and 46 were rejected under 35 U.S.C. §103(a) as being unpatentable over Huitema-Burgess-Hovell in view of Zenchelsky et al (US 6,233, 686 B1).

Applicants respectfully traverse the rejection of Claims 44 and 46 because Zenchelsky does not supply the required features missing from Huitema-Burgess-Hovell (*i.e.* a Web server device for receiving a selection of the client device and an instruction for controlling the client

device from a user via the Internet, and a command conversion section for converting an instruction received from a user at the Web server device to a command to be sent to the client device in a predetermined manufacturer model specific format to control the client device). Therefore, it is believed that Claims 44 and 46 are in condition for allowance.

IV. Conclusion

In view of the foregoing amendments and remarks, it is believed that all of the remaining claims in this application, namely, Claims 4-6, 8-14, 21, 22 and 25-46, are in condition for allowance. Early and favorable reconsideration is respectfully requested.

A telephone interview is respectfully requested to discuss any remaining issues in an effort to expedite allowance of this application. To that end, the Examiner is invited to contact the undersigned at 972-739-6927.

Respectfully submitted,



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